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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

HCL PARTNERS LIMITED PARTNERSHIP, On Behalf of Itself and All Others Similarly Situated, Plaintiff, vs. LEAP WIRELESS INTERNATIONAL, INC., et al., Defendants.	No. 3:07-cv-02245-BTM(NLS) CLASS ACTION ALASKA ELECTRICAL PENSION FUND AND GENESEE COUNTY EMPLOYEES' RETIREMENT SYSTEM'S NOTICE OF MOTION AND MOTION FOR APPOINTMENT AS LEAD PLAINTIFF, APPROVAL OF THEIR SELECTION OF LEAD COUNSEL AND CONSOLIDATION OF RELATED ACTIONS DATE: March 28, 2008 TIME: 11:00 a.m. COUTROOM: 15 Hon. Barry Ted Moskowitz

PER CHAMBERS, NO ORAL ARGUMENT UNLESS REQUESTED BY COURT

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that as soon as practicable as the matter may be heard, in Courtroom 15 of the Honorable Barry Ted Moskowitz, United States District Court, 940 Front Street, San Diego, California 92101, the Alaska Electrical Pension Fund ("Alaska") and Genesee County Employees' Retirement System ("Genesee") will, and hereby do, move this Court under §21D(a)(3)(B) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. §78u-4(a)(3)(B), for entry of an order: (1) consolidating related actions pursuant to Fed. R. Civ. P. 42(a); (2) appointing Alaska and Genesee as lead plaintiff for the class; and (3) approving their selection of Labaton Sucharow LLP as lead counsel and Coughlin Stoia Geller Rudman & Robbins LLP ("Coughlin Stoia") as liaison counsel. This Motion is made on the grounds that Alaska and Genesee are entitled to the presumption that they are the "most adequate plaintiff." *See* 15 U.S.C. §78u-4(a)(3)(B).

This Motion is based upon this Notice of Motion, the Memorandum of Points and Authorities in support thereof, the Declaration of Ramzi Abadou, the pleadings and files herein and such other written or oral argument as may be presented to the Court.

DATED: January 28, 2008

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s/ Ramzi Abadou
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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 28, 2008.

s/ Ramzi Abadou

RAMZI ABADOU

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Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- `(No manual recipients)`